

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION**

POINT BLANK BODY ARMOR, INC.

Plaintiff,

v.

ALLEN PRICE,
JOSEPH KRUMMEL, and
JAMES MURRAY

Defendants.

Civil Action No. MJG 01 CV 3256

ALLEN PRICE,
JOSEPH KRUMMEL, and
JAMES MURRAY

Counter-plaintiffs,

v.

POINT BLANK BODY ARMOR, INC.

Counter-defendant.

**DEFENDANTS AND COUNTER-PLAINTIFFS'
PROPOSED NEUTRAL CASE SUMMARY
FOR VOIR DIRE**

Defendants and Counter-Plaintiffs, Allen Price, Joseph Krummel, and James Murray, by their undersigned attorneys, submit the following case summary to be read to the voir dire panel:

This matter involves Defendants Allen Price, Joseph Krummel, and James Murray, and their former employer, the Plaintiff, Point Blank Body Armor, Inc.. Point Blank is in the business of manufacturing bullet resistant vests and similar

products. Prior to September 28, 2001, Price, Krummel and Murray were employed to conduct product research and development for Point Blank. Point Blank began this litigation by suing Price, Krummel and Murray for alleged misuse of confidential information and misappropriation of trade secrets. The Court has already determined that Point Blank's claims were without merit and has dismissed them from the case. The case is proceeding to trial on the Price, Krummel and Murray's counter claims for unpaid salary and benefits, including stock and stock options, to which they believe they are entitled in connection with their employment by Point Blank, as well as a claim that Point Blank acted in bad faith when it brought and pursued its claim for trade secret misappropriation.

In accordance with the Court's Order, on June 16, 2003 Defendants and Counter-Plaintiffs submitted this proposed summary to counsel for Plaintiff and Counter-Defendant so that it might be submitted jointly by all parties. Plaintiff's counsel advised that, due to fundamental differences between the parties as to the scope of the issues that are to be resolved at trial, Plaintiff could not adopt the above summary and did not believe that the parties could agree to a joint summary at this time.

Date: June 23, 2003

/s/

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